

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GREGORY CONTE and WARREN
BALOGH,

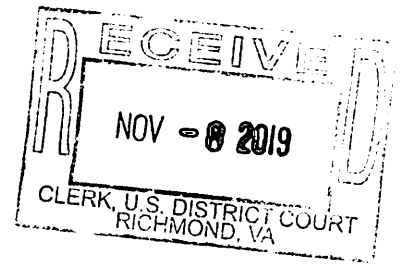
Plaintiffs,

v.

COMMONWEALTH OF VIRGINIA,
TERENCE R. MCAULIFFE, VIRGINIA
STATE POLICE, STEVEN FLAHERTY,
BECKY CRANNIS-CURL, BRIAN
JOSEPH MORAN, CITY OF
CHARLOTTESVILLE, MICHAEL
SIGNER, WES BELLAMY,
CHARLOTTESVILLE POLICE
DEPARTMENT, AL THOMAS, JR.,
EDWARD GORCENSKI, SETH
WISPELWEY, DWAYNE DIXON,
DARYL LAMONT JENKINS, and LACEY
MACAULEY

Defendants.

Civil Action No.:3:19-cv-00575-MHL



**PLAINTIFFS' MOTION TO EXTEND TIME
FOR SERVICE PURSUANT TO Fed. R. Civ. P. 4(m)**

Plaintiffs hereby respectfully move this Court under Fed. R. Civ. P. 4(m) for an Order extending the time for service of the Complaint and Summons on all Defendants. Rule 4(m) requires the Court to extend the time period for service of a complaint upon a showing of good cause.

Good cause exists sufficient for the Court to grant Plaintiffs' extension request. Local Civil Rule 4(A) requires all complaints to be served within 90 days. Plaintiffs filed their Complaint on August 12, 2019. Plaintiffs' delay in serving the Complaint resulted

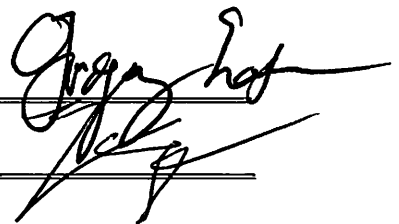
from Plaintiffs' diligence in identifying the physical addresses of various defendants and in securing the financial resources needed in order to effect service. Plaintiffs have also made extensive efforts to hire a lawyer who is authorized to practice in the United States District Court for the Eastern District of Virginia, or to bring in an outside lawyer with the sponsorship of another lawyer barred in that district. All lawyers who they have approached have demurred, citing the case's politically sensitive nature, or, citing the same fact, have demanded far more money than the plaintiffs can afford. Plaintiffs intend to continue to search for a way to find suitable legal representation. Defendants will not suffer any prejudice from extending time to serve the Complaint. Discovery has yet to take place. Moreover, the allegations in this case concern violations of fundamental constitutional rights and racketeering activity. Thus, the Complaint's allegations present sufficient cause for the Court to exercise its discretion. In light of these various factors, Plaintiffs respectfully ask this Court to grant a 90-day extension of the time period for serving Defendants individually.

Dated: November 7, 2019

Respectfully submitted:

/s/ Gregory Conte

/s/ Warren Balogh

Handwritten signatures of Gregory Conte and Warren Balogh. The signature of Gregory Conte is written over the line for his name, and the signature of Warren Balogh is written over the line for his name.